

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. ) CRIMINAL NO. 17-cr-10300-LTS  
CURTIS SIMONEAU )

**MOTION TO FILE DEFENDANT'S SENTENCING MEMORANDUM UNDER SEAL**

The Defendant, Curtis Simoneau, hereby moves that this Court grant him leave to file his sentencing memorandum and related exhibits under seal. As grounds for this motion, undersigned counsel state that the memorandum will address in detail Mr. Simoneau's medical history, mental health history, and other matters of a sensitive nature and should not be available on the public record.

Respectfully submitted,  
CURTIS SIMONEAU  
by his attorney  
/s/ Scott Lauer  
Scott Lauer (BBO #667807)  
FEDERAL PUBLIC DEFENDER OFFICE  
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**Certificate of Service**

I, Scott Lauer, hereby certify that copies of this motion were submitted via electronic mail to Assistant United States Attorney David Tobin and U.S. Probation Officer Maria D'Addieco.

Date: September 28, 2017

/s/ Scott Lauer

Scott Lauer